

Magistrate Judge David W. Christel

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS CARMONA-GONZALES,

Defendant.

NO. CR13-5513 RJB

UNITED STATES' MOTION  
TO FILE OVERLENGTH  
OPPOSITION BRIEF

Note on Motion Calendar:  
December 8, 2022

The United States requests permission to file an overlength response to defendant Carlos Carmona-Gonzales's motion to reopen the November 1, 2022 detention hearing or for temporary release (Dkt. 144). The United States' opposition brief is eight pages over the Court's default limit. *See* Local Crim. R. 12(b)(5).

Good cause supports this request. First, recounting the relevant facts and long procedural history of this case fills almost half of the government's 20-page brief. Those facts and history bear directly on Carmona-Gonzales's pending motion.

Second, the United States' brief quotes extensively from the detention hearing that Carmona-Gonzales is now moving to reopen. In support of his motion, Carmona-Gonzales did not provide the Court with the audio recording or a transcript of that hearing. The government obtained the audio recording this week. Our brief quotes several relevant statements made by defense counsel and by the Court at the hearing. Those quotations take up significant space in the United States' brief but are key to assessing Carmona-

1 Gonzales's present arguments. (The United States is manually filing the audio recording  
2 as Exhibit 2 to its opposition brief.)

3 Finally, the United States' brief cites and analyzes a range of statutes, rules, and  
4 caselaw relevant to Carmona-Gonzales's arguments. Undersigned counsel has tried to keep  
5 the brief as concise as possible while fully addressing Carmona-Gonzales's arguments.

6 The United States thus asks the Court to accept the overlength opposition brief.

7 November 8, 2022

Respectfully submitted,

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9 NICHOLAS W. BROWN  
United States Attorney

10 s/ Jonas Lerman

11 KRISTINE L. FOERSTER  
12 JONAS LERMAN  
13 Assistant United States Attorneys  
14 1201 Pacific Avenue, Suite 700  
15 Tacoma, WA 98402  
16 kristine.foerster@@usdoj.gov  
17 jonas.lerman@usdoj.gov  
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